

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

BEECHER COTTON, PAMELA COLON,
SIRDINA ISAAC-JOSEPH, ESTHER
CLIFFORD, SYLVIA BROWNE, ALVINA
JEAN MARIE ILARRAZA, RYAN
ALLEYNE, AGNES AUGUSTUS, and
SE SARINA MIRANDA, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

LIMETREE BAY VENTURES, LLC,
LIMETREE BAY HOLDINGS, LLC,
LIMETREE BAY REFINING, LLC, LBR
LIQUIDATING TRUST, DAVID M. DUNN,
LIMETREE BAY TERMINALS, LLC, DBA
OCEAN POINT TERMINALS, ARCLIGHT
CAPITAL PARTNERS, LLC, FREEPOINT
COMMODITIES, LLC, EIG GLOBAL
ENERGY PARTNERS, LLC, BP
PRODUCTS NORTH AMERICA, INC.,
UNIVERSAL PLANT SERVICES, (VI),
LLC, EXCEL CONSTRUCTION &
MAINTENANCE VI, INC., ELITE
TURNAROUND SPECIALISTS, LTD.,
PINNACLE SERVICES LLC, VERSA
INTEGRITY GROUP, INC., NATIONAL
INDUSTRIAL SERVICES, LLC, and JOHN
DOES 1-100,

Defendants.

CASE NO. 1:21-cv-00261-WAL-EAH

ACTION FOR DAMAGES AND
INJUNCTIVE RELIEF

JURY TRIAL DEMANDED

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Kevin F. D'Amour, Esq. and Gaylin Vogel, Esq. of the law offices of BARNES, D'AMOUR & VOGEL, hereby enter their appearance as attorneys of record on behalf of Defendant, National Industrial Services, LLC. It is requested that copies of all papers filed with the Court and all notices and orders be served on Attorneys D'Amour and Vogel to the

email addresses set forth below.

Respectfully submitted,

Dated: March 20, 2023

/s/Kevin F. D'Amour

Kevin F. D'Amour, Esq., VI Bar No. 288

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